

EXHIBIT B

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Attorneys for Defendants
 The Church of Jesus Christ of Latter-day
 Saints, Brigham Young University, Brigham
 Young University Museum of Art, Deseret
 Management Corporation, Deseret Book
 Company, and Latter-day Home LLC

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA
 SOUTHERN DIVISION

TIM TEICHERT, PERSONAL
 REPRESENTATIVE OF THE
 ESTATE OF MINERVA TEICHERT,

Plaintiff,

v.

THE CHURCH OF JESUS CHRIST
 OF LATTER-DAY SAINTS,
 BRIGHAM YOUNG UNIVERSITY,
 BRIGHAM YOUNG UNIVERSITY
 MUSEUM OF ART, DESERET
 MANAGEMENT CORPORATION,
 DESERET BOOK COMPANY, and
 LATTER-DAY HOME LLC,

Defendants.

CASE NO. 8:23-cv-00180-FWS-JDE

**DECLARATION OF HOLLY K.
 VICTORSON IN SUPPORT OF
 DEFENDANTS' MOTION TO
 TRANSFER VENUE**

1 I, Holly K. Victorson, hereby declare and state as follows:

2 1. I am a member in good standing of the bar of the State of California
3 and an attorney for the law firm of Latham & Watkins LLP, counsel for
4 Defendants in this matter. I have personal, first-hand knowledge of the facts set
5 forth in this Declaration. If called as a witness, I could and would competently
6 testify to these facts under oath.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of the
8 complaint filed by Tim Teichert (“Mr. Teichert”), as personal representative of the
9 Estate of Herman Teichert and the Estate of Minerva Teichert, in Wyoming state
10 court on October 23, 2020, No. CV-2020-141-DC.

11 3. Attached hereto as **Exhibit B** is a true and correct copy of the
12 complaint filed by Mr. Teichert, as personal representative of the Estate of Herman
13 Teichert and the Estate of Minerva Teichert, in Wyoming state court on June 15,
14 2021, No. CV-2021-87-DC, as it was filed in connection with *Teichert v. Church*
15 *of Jesus Christ of Latter-day Saints*, No. 2:21-cv-00145-ABJ (D. Wyo.)
16 (“Wyoming Litigation”) (ECF No. 2).

17 4. Attached hereto as **Exhibit C** is a true and correct copy of the notice
18 of removal of Wyoming state court case No. CV-2021-87-DC to the United States
19 District Court for the District of Wyoming, as it was filed on July 28, 2021 in the
20 Wyoming Litigation (ECF No. 1).

21 5. Attached hereto as **Exhibit D** is a true and correct copy of the
22 amended complaint filed by Mr. Teichert, as personal representative of the Estate
23 of Herman Teichert and the Estate of Minerva Teichert, on November 23, 2021 in
24 the Wyoming Litigation (ECF No. 26).

25 6. Attached hereto as **Exhibit E** is a true and correct copy of the current
26 scheduling order in the Wyoming Litigation, dated December 22, 2022 (ECF
27 No. 44).

1 7. Attached hereto as **Exhibit F** is a true and correct copy of a webpage
2 titled “Springville Museum of Art - Indian Captives at Night,” as captured on
3 March 14, 2023 at the following URL: [https://webkiosk.springville.org/objects-](https://webkiosk.springville.org/objects-1/info/726)
4 [1/info/726](https://webkiosk.springville.org/objects-1/info/726).

5 8. Attached hereto as **Exhibit G** is a true and correct copy of a webpage
6 titled “Herding Cattle across the River – Works – eMuseum,” as captured on
7 March 14, 2023 at the following URL: [http://collections.starkculturalvenues.org/](http://collections.starkculturalvenues.org/objects/40678/herding-cattle-across-the-river)
8 [objects/40678/herding-cattle-across-the-river](http://collections.starkculturalvenues.org/objects/40678/herding-cattle-across-the-river).

9 9. Attached hereto as **Exhibit H** is a true and correct copy of
10 Defendants’ Answer to Complaint and Affirmative Defenses, filed on
11 September 3, 2021 in the Wyoming Litigation (ECF No. 13).

12 10. Attached hereto as **Exhibit I** is a true and correct copy of a document
13 titled “Table C. U.S. District Courts—Civil Cases Commenced, Terminated, and
14 Pending During the 12-Month Periods Ending March 31, 2021 and 2022,” as
15 downloaded on March 14, 2023 from the URL: [https://www.uscourts.gov/](https://www.uscourts.gov/statistics/table/c/federal-judicial-caseload-statistics/2022/03/31)
16 [statistics/table/c/federal-judicial-caseload-statistics/2022/03/31](https://www.uscourts.gov/statistics/table/c/federal-judicial-caseload-statistics/2022/03/31).

17 11. Attached hereto as **Exhibit J** is a true and correct copy of a webpage
18 titled “Judges’ Procedures and Schedules | Central District of California | United
19 States District Court,” as captured on March 15, 2023 at the following URL:
20 <https://www.cacd.uscourts.gov/judges-schedules-procedures>.

21 12. Attached hereto as **Exhibit K** is a true and correct copy of a webpage
22 titled “Court Info | District of Wyoming | United States District Court,” as captured
23 on March 15, 2023 at the following URL: [https://www.wyd.uscourts.gov/court-](https://www.wyd.uscourts.gov/court-info)
24 [info](https://www.wyd.uscourts.gov/court-info).

25 13. Exhibit I indicates that, as of March 31, 2022, 10,182 civil cases were
26 pending before the Central District of California and 254 civil cases were pending
27 before the District of Wyoming.
28

15. Assuming there are as many civil cases pending today as there were on March 31, 2022 (the latest public data reflected in Exhibit I), averaging the number of pending civil cases per active judge results in 299 pending civil cases per active judge in the Central District of California and 85 pending civil cases per active judge in the District of Wyoming (rounded to the nearest whole number).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on March 31, 2023 at Washington, D.C.

/s/ Holly K. Victorson
Holly K. Victorson